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To: [Jonathan Freedman/R10/USEPA/US@EPA](#); [Chip Humphrey/R10/USEPA/US@EPA](#)
Subject: Willbridge terminal dredging 401 conditions
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Hiya!

Hope your new year has started off well!

Just wanted to check in with you regarding conditions requiring additional sampling post dredging at the 3 Willbridge terminal dredging sites (Chevron, Conoco-Phillips and Kinder-Morgan). Here's the low down:

- All are disposing upland as material unsuitable for in-water.
- Chevron (in the middle) is going to -40.5 ft and has a PRG determination that the leave surface is ok (some PAHs and DDx, but all below DEQ fish bioaccum SLs).
- Conoco and K-M (on either side of Chevron) are going to -39 and -39.5, respectively, and both proposing temporary sand caps (6 – 12 in) following dredging.
 - Conoco has Mercury, Zinc, PCBs and BEHP above DEQ bioaccum SLs (except Zinc) and the newly exposed surface will have higher levels of Mercury, Zinc, PCBs, DDx, and BEHP than the existing surface.
 - K-M did not sample sediment, but is doing DRET with results due in a couple of weeks.

My question is, do you think it is warranted to require sediment grab sampling for the CoCs noted at the new surface?

My initial thinking is that we should require it for Chevron, since there is no cap and confirmation of actual levels exposed would be good. Especially if sloughing does occur and we get samples just after that. Then we could evaluate the "natural recovery" by contrasting the results of the next sampling event prior to dredging next time (likely within the four years after initial deepening). Theoretically, they would be re-exposing those initial levels each time they did maintenance dredging, so it is probably a good policy to know what those levels are and that they are acceptable.

I'm not sure about requiring sampling prior to capping for Conoco and K-M, though. It might provide good info for EPA, but can we justify the costs to the applicants if they place a cap which presumably is protective? They would still be required to sample prior to the next dredging event (is that right, Jonathan?) so we would have a comparison of clean cap to material coming in.

Please let me know what you think. I am aiming to finish these up by mid March or early April.

Thanks.

--Alex

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Got questions about the 401 WQC process? Check out DEQ's new 401 Certification website at: <http://www.deq.state.or.us/wq/sec401cert/sec401cert.htm>